

## REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Rejection of Claims 11-20 Under 35 USC §112, 2<sup>nd</sup> Paragraph

This rejection has been addressed by:

- a. amending claim 11 to clarify that the invention is an arrangement in which an electro-luminescent element is sealed within a protective unit made up of multiple pieces, the means that seals the EL element within the unit also sealing the protective pieces together--*i.e.*, the invention is in fact a device **made by** a particular “means,” and not a method, means for making, or utility of a device;
- b. amending claim 15 to delete any reference to animals;
- c. amending various claims to consistently recite a –protective unit– rather than a “plastic piece”;
- d. amending claim 11 to recite “multiple selected conditions” and “multiple selected processing operations”; and
- e. canceling claims 18-20.

With respect to the recitation of selected conditions and processing operations, it is respectfully noted that the specific conditions under which the multiple pieces are made, and the particular processing operations used to make the pieces, are not essential to the invention and that it would make no sense to arbitrarily limit the invention to a particular processing condition or operation. Instead, the point of the invention is that the “**protective unit**” is made up of **multiple pieces made of multiple different materials, under multiple different conditions, by multiple different processes**, all sealed together by the sealing means that also seals the EL element into the protective piece

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2. Rejection of Claims 11-20 Under 35 USC §103(a) in view of U.S. Patent No. 6,639,355 (Pennaz)

This rejection is respectfully traversed on the grounds that the Pennaz patent fails to disclose or suggest sealing the electro-luminescent element *and conductive means* into a **single** protective **unit** made up of a **plurality of envelope pieces** that are made of **multiple materials** and that have been **formed** under **multiple selected conditions**.

The alleged "sealing means" 98 of Pennaz not a protective unit at all. It is actually simply one of the layers of the EL element. Element 98 of Pennaz does not seal an EL element and conductive means, as claimed, much less being made of multiple envelope pieces, also as claimed. As a result, withdrawal of the rejection of claim 11 under 35 USC §103(a) is respectfully requested.

3. Rejection of Claims 18-20 Under 35 USC §103(a)

This rejection has been rendered moot by the cancellation of claims 18-20.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

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